

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Case No. 08-01420 (JMP)
Lehman Brothers Inc.,	:	SIPA
	:	
Debtor,	:	
_____	:	
In re:	:	Chapter 11
Lehman Brothers Holdings, Inc., <u>et al.</u>	:	Case No.: 08-13555 (JMP)
	:	(Jointly Administered)
Debtors.	:	

**STIPULATION CONCERNING SCHEDULING BETWEEN
THE DEBTORS, TRUSTEE, COMMITTEE AND THE BANK OF
TOKYO-MITSUBISHI UFJ, LTD., AUSTRALIA & NEW
ZEALAND BANKING GROUP LTD. AND LLOYDS TSB BANK plc**

This Stipulation concerning scheduling (the “Stipulation”) is entered into by and among the undersigned counsel, acting for and on behalf of their respective clients: (a) Lehman Brothers Holdings, Inc. (“LBHI”) and its affiliated debtors and debtors-in-possession in the Chapter 11 Cases (collectively, the “Debtors”); (b) James W. Giddens, As Trustee in the Securities Investor Protection Act Liquidation of Lehman Brothers Inc. (the “Trustee”); (c) the Official Committee of Unsecured Creditors of Lehman Brothers Holdings, Inc. and its affiliated debtors and debtors in possession (the “Committee”) (Debtors, Trustee and Committee collectively the “Moving Parties,” and each a “Moving Party”); (d) The Bank of Tokyo-Mitsubishi UFJ, Ltd. (“BTMU”); (e) Australia & New Zealand Banking Group Ltd., properly named Australia and New Zealand Banking Group Limited (“ANZ”); and (f) Lloyds TSB Bank plc (“Lloyds”) (BTMU, ANZ and Lloyds collectively the “OCC Interpleader Defendant Banks”).

WHEREAS, on September 15, 2009: (i) LBHI filed Debtor's Motion for an Order, Pursuant to Fed.R.Civ.P. 60 and Fed.R.Bankr.P 9024, Modifying the September 20, 2008 Sale Order and Granting Other Relief; (ii) The Trustee filed The Trustee's Motion for Relief Pursuant to the Sale Orders or, Alternatively, for Certain Limited Relief under Rule 60(b); and (iii) the Committee filed the Motion of Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc., Et Al., Pursuant to 11 U.S.C. § 105(a), Fed.R.Civ.P. 60(b), and Fed.R.Bankr.P. 9024, for Relief from Order under 11 U.S.C. §§ 105(a), 363, and 365 and Federal Rules of Bankruptcy Procedure 2002, 6004 and 6006 Authorizing and Approving (A) Sale of Purchased Assets Free and Clear of Liens and Other Interests and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases, Dated September 20, 2008 (and Related SIPA Sale Order) and Joinder in Debtors' and SIPA Trustee's Motions for an Order under Rule 60(b) to Modify Sale Order (collectively referred to hereinafter as the "Moving Parties' Rule 60 Motions");

WHEREAS, the Moving Parties' Rule 60 Motions each currently have an Objection Deadline of October 9, 2009 and a Hearing Date of October 15, 2009;

WHEREAS, Barclays Capital Inc. ("Barclays"), LBHI, the Trustee and the Committee have each agreed to an adjournment of the above-referenced Objection Deadline and Hearing Date;

WHEREAS, the OCC Interpleader Defendant Banks have requested that the schedule for Objection Deadline and Hearing Date that may be agreed or Ordered as among the Moving Parties and Barclays also apply to any submissions by the OCC Interpleader Defendant Banks;

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND UPON
COURT APPROVAL HEREOF, IT IS ORDERED THAT:

1. The schedule for Objection Deadline and Hearing Date that may be agreed or Ordered as among the Moving Parties and Barclays also shall apply to any response or objection filed by the OCC Interpleader Defendant Banks.

2. This Stipulation may be executed in separate counterparts (which may include counterparts delivered by facsimile or email transmission).

Dated: New York, New York
October 8, 2009

HUGHES HUBBARD & REED LLP

OTTERBOURG, STEINDLER,
HOUSTON & ROSEN, PC

By: /s/ Kenneth E. Lee
James B. Kobak, Jr.
Kenneth E. Lee
Sarah L. Cave
One Battery Park Plaza
New York, New York 10004
(212) 837-6000

By:: /s/ Peter Feldman
Peter Feldman
230 Park Avenue
New York, New York 10169-0075
(212) 661-9100

Attorneys for James W. Giddens,
Trustee for the SIPA Liquidation of
Lehman brothers Inc.

Attorneys for Interpleader Defendant The
Bank of Tokyo-Mitsubishi UFJ, Ltd.

JONES DAY

EMMET, MARVIN & MARTIN, LLP

By: /s/ William J. Hine
Robert W. Gaffey
William J. Hine
222 East 41st Street
New York, New York 10017
(212) 326-3939

Special Counsel to the Debtors and
Debtors in Possession

By: /s/ Kenneth M. Bialo
Kenneth M. Bialo
120 Broadway, 32nd Floor
New York, New York 10271
(212) 238-3000

Attorneys for Interpleader Defendant
Australia & New Zealand Banking Group
Ltd.

QUINN EMANUEL URQUHART
OLIVER & HEDGES, LLP

KASOWITZ, BENSON, TORRES &
FRIEDMAN LLP

By: /s/ James Tecce
Susheel Kirpalani
James Tecce
Eric Kay
51 Madison Avenue
New York, New York 10010
(212) 849-7000

Special Counsel to the Official Committee
of Unsecured Creditors of Lehman
Brothers Holdings, Inc., et al.

By: /s/ Jonathan Minsker
Jonathan Minsker
Harold G. Levison
1633 Broadway
New York, New York 10019
(212) 506-1700

Attorneys for Interpleader Defendant
Lloyds TSB Bank plc

SO ORDERED:

Dated: New York, New York
October 13, 2009

s/ James M. Peck
UNITED STATES BANKRUPTCY JUDGE